

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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YENSY CONTRERAS, Individually, and On
Behalf of All Others Similarly Situated,

Docket No.: 1:21-cv-09434

Plaintiffs,

NOTICE OF MOTION

- against -


SCRUB DADDY, INC.,

Defendant.
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PLEASE TAKE NOTICE that upon the Declaration of John J. Byrnes, Esq., sworn to on February 11, 2022, and upon all the papers and proceedings herein, and upon such other documentary and oral evidence as may be presented at the time of the hearing, the Defendant, SCRUB DADDY, INC., will move this Honorable Court at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, at such date and time as is convenient to the Court, for an order pursuant to Fed. R. Civ. P. 12(b)(1), Fed. R. Civ. P. 12(b)(2), and Fed. R. Civ. P. 12(b)(6), granting dismissal of the Complaint with prejudice in favor of Defendant, SCRUB DADDY, INC. and against Plaintiffs with respect to all causes of action in the Complaint for lack of subject matter jurisdiction, lack of personal jurisdiction, and failure to state a cause of action upon which relief can be granted; and for such other and further relief as this Court deems just and proper.

Dated: Woodbury, New York
February 11, 2022

MILBER MAKRIS PLOUSADIS
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